



IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL DAVID SILLS and )  
MARY SILLS, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
SOUTHERN BAPTIST CONVENTION, )  
a non-profit corporation; DR. ED )  
LITTON, Individually, and as agent )  
and/or employee of SOUTHERN )  
BAPTIST CONVENTION; LIFEWAY )  
CHRISTIAN RESOURCES OF THE )  
SOUTHERN BAPTIST CONVENTION, )  
a non-profit corporation; JENNIFER )  
LYELL, Individually and as agent and/or )  
employee of LIFEWAY CHRISTIAN )  
RESOURCES OF THE SOUTHERN )  
BAPTIST CONVENTION and )  
SOUTHERN BAPTIST CONVENTION; )  
ERIC GEIGER, Individually and as )  
agent and/or employee of LIFEWAY )  
CHRISTIAN RESOURCES OF THE )  
SOUTHERN BAPTIST CONVENTION )  
and SOUTHERN BAPTIST )  
CONVENTION; EXECUTIVE )  
COMMITTEE OF THE SOUTHERN )  
BAPTIST CONVENTION, a non-profit )  
corporation; BART BARBER, )  
Individually and as agent and/or )  
Employee of SOUTHERN BAPTIST )  
CONVENTION; WILLIE MCLAURIN, )  
Individually and as agent and/or )  
employee of SOUTHERN BAPTIST )  
CONVENTION and EXECUTIVE )  
COMMITTEE OF THE SOUTHERN )  
BAPTIST CONVENTION; ROLLAND )  
SLADE, Individually and as agent and/or )  
employee of SOUTHERN BAPTIST )  
CONVENTION and EXECUTIVE )  
COMMITTEE OF THE SOUTHERN )  
BAPTIST CONVENTION; THE )

Case No. 3:23-cv-00478  
JUDGE WILLIAM L. CAMPBELL, JR.  
Magistrate Judge Frensley  
  
JURY TRIAL DEMANDED

SOUTHERN BAPTIST )  
 THEOLOGICAL SEMINARY, a )  
 non-profit corporation; DR. R. ALBERT )  
 MOHLER, Individually and as agent )  
 and/or employee of THE SOUTHERN )  
 BAPTIST THEOLOGICAL SEMINARY )  
 and SOUTHERN BAPTIST )  
 CONVENTION; SOLUTIONPOINT )  
 INTERNATIONAL, INC., a corporation,) )  
 individually and d/b/a GUIDEPOST )  
 SOLUTIONS; and GUIDEPOST )  
 SOLUTIONS, LLC a limited liability )  
 corporation and agent of the Southern )  
 Baptist Convention. )  
 )  
 Defendants. )

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE**  
**RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to Fed. R. Civ. P. 6 and Local Rule 6.01, Defendants SolutionPoint International, Inc. and Guidepost Solutions, LLC (collectively the “Guidepost Defendants”), respectfully move the Court for an extension of time up to and including **July 12, 2023** to answer, move or otherwise respond to Plaintiffs’ Complaint, filed May 11, 2023 (Doc. 1).

Counsel for the Guidepost Defendants has contacted counsel for Plaintiffs, and they have confirmed Plaintiffs have no opposition to this Motion. Further, counsel for Plaintiffs and counsel for the Guidepost Defendants agree that in seeking an extension of time to answer, move or otherwise respond, the Guidepost Defendants are not waiving any defense, including the defense of lack of personal jurisdiction.

The Guidepost Defendants respectfully request entry of an Order extending the time within which the Guidepost Defendants have to answer, move or otherwise respond to Plaintiffs’ Complaint up to and including **July 12, 2023**.

Respectfully submitted,

s/Katharine R. Klein

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-and-

Steven G. Mintz (*pro hac vice* motion to be submitted)  
Terence W. McCormick (*pro hac vice* to be submitted)  
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*Counsel for Defendants  
SolutionPoint International, Inc. and  
Guidepost Solutions LLC*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via the ECF Court System on this 23rd day of May, 2023 on the following:

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s/Katharine R. Klein\_\_\_\_\_